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Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PETER R. FADER
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

**NOTICE OF HEARING ON
CHAPTER 7 TRUSTEE'S MOTION
FOR ORDER AUTHORIZING
PAYMENT OF ESTATE'S POST-
PETITION TAX OBLIGATIONS**

Hearing Date

Date: November 15, 2022

Time: 11:30 a.m.

Place: Courtcall/Videoconference

Judge: Honorable Dennis Montali

Objection Deadline: November 8, 2022

PLEASE TAKE NOTICE THAT the Bankruptcy Court will hold a hearing on the *Chapter 7 Trustee's Motion for Order Authorizing Payment of Estate's Post-Petition Tax Obligations* (the "Motion") on **November 15, 2022 at 11:30 a.m (Pacific Time)** before the Honorable Dennis Montali, United States Bankruptcy Judge. By way of the Motion, the Trustee seeks authority to pay administrative expense tax claims resulting from a proposed settlement of a lawsuit currently pending before the Bankruptcy Court in Adversary Proceeding No. 20-03007. The Trustee has agreed, subject to Bankruptcy Court approval, to settle the estate's claims asserted in that lawsuit in for \$5,000,000 payable in two equal installments of \$2,500,000 each. If the Bankruptcy Court approves the proposed settlement and upon the estate's receipt of each \$2,500,000

1 installment, the estate will incur tax obligations that are not anticipated to exceed the following
2 amounts owing to: (a) the United States Treasury in the amount of \$345,000 for the 2022 tax year
3 and \$265,000 for the 2023 tax year; and (b) the California Franchise Tax Board, in the amount of
4 \$128,000 for the 2022 tax year and \$106,000 for the 2023 tax year. By way of this Motion, the
5 Trustee requests authority to pay these tax obligations in an amount not to exceed those noted here.

6 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Bankruptcy Court's *Eighth*
7 *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective
8 December 1, 2021 and until otherwise ordered, all hearings shall be conducted by video or
9 teleconference. The Courtroom will be closed.

10 **All interested parties should consult the Bankruptcy Court's website**
11 **at www.canb.uscourts.gov for information about court operations**
12 **during the COVID-19 pandemic. The Bankruptcy Court's website**
13 **provides information regarding how to arrange a telephonic or video**
14 **appearance. If you have any questions regarding how to appear at a**
15 **court hearing, you may contact the Bankruptcy Court by calling 888-**
16 **821-7606 or by using the Live Chat feature on the Bankruptcy**
Court's website.

17 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Motion must comply with the
18 Federal Rules of Bankruptcy Procedure, the Local Rules of the Court, and must be filed with the
19 above captioned Court and served (by first class mail or email) by **November 8, 2022** upon counsel
20 for the Trustee:

21 Miriam Manning
22 PACHULSKI STANG ZIEHL & JONES LLP
23 One Sansome Street, 34th Floor, Suite 3430
24 San Francisco, CA 94104
25 mmanning@pszjlaw.com

26 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
27 documents can be viewed and/or obtained: (i) by accessing the Court's website at
28 **<http://www.canb.uscourts.gov>**; (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102 or (iii) contacting counsel for the Trustee, Miriam Manning

1 at mmaning@pszjlaw.com. Note that a PACER password is needed to access documents on the
2 Bankruptcy Court's website.

3 **PLEASE TAKE FURTHER NOTICE** that if there is no timely written opposition to the
4 Motion, the Court may enter an order granting the relief requested in the Motion without further
5 hearing or notice.

6 Dated: October 21, 2022

PACHULSKI STANG ZIEHL & JONES LLP

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8 By: /s/ Miriam Manning
9 Miriam Manning
10 Counsel for E. Lynn Schoenmann,
11 Chapter 7 Trustee
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